• The bad news is that we are all crammed in here at 7pm on a Tuesday night listening to me. The good news is that I'm well versed in the art of brevity.

• First of all, let me thank you for this opportunity to speak to you on behalf of the Members of our cooperative and unfortunately express our opposition to the EPA’s proposed rules for existing power plants.

• My name is Jay Gill and I am the Manager of Communications and Public Relations for Carroll EMC. Carroll EMC is a not-for-profit, consumer-owned business that distributes electricity to roughly 50,000 residential, commercial and industrial accounts. Our service area covers a large portion of western Georgia from Polk and Paulding counties down to the top of Troup and along the edge of Coweta. As an employee, I am naturally concerned about any regulation that is placed on our industry that doesn’t make sense. However, as a Member and a consumer, I am more concerned about the affects of this policy regarding reliability and cost increase.

• At Carroll EMC we judge every government policy against the impact it will have on our ability to provide our members and our communities with safe, reliable and affordable power. We ask the EPA to withdraw its proposed guidance and start over because the proposal as drafted undermines those goals. In fact, I have yet to hear of any professional in our industry speak out against the idea of clean air, clean water or clean soil. As professionals, we understand that it takes careful planning and time to phase out older technology and replace it with new technology, especially if that newer technology doesn’t exist yet. If you are waiting on a liver transplant, you don’t unplug your life support machine hoping the donor organ will get to you more quickly.

• But more importantly, there are many reasons we oppose these regulations. First and foremost we believe Georgia is being treated unfairly in these rules.

• These proposed regulations ignore the significant progress Georgia has already made in reducing greenhouse gas emissions. Georgia has reduced CO2 emissions by approximately 30% between 2005 and 2012. That is equivalent to the national goal the EPA set for 2030. In other words, Georgia has already achieved EPA’s goal.
• Yet instead of rewarding this early action by codifying the state of Georgia’s accomplishment, or at most seeking a modest further reduction, these rules instead require another 44% emission reduction by 2030.

• Under EPA’s plan, Georgia will be making the 6th largest reduction required of states nationwide and so Georgia is being penalized for taking significant early action. We consider this a bad policy and unfair treatment.

• Again, I believe we all agree on the ultimate goal or ideal of reducing dependency on fossil fuels, however there is a much better way to achieve this goal. My first suggestion is to retain input from the engineers and professionals in the power industry, including cooperatives.

• On behalf of Carroll EMC, I urge you to abandon these rules and work with cooperatives to achieve a more balanced approach that treats states fairly.

• Thank you for the opportunity to be here today.